

EXHIBIT B



AN Bax <office.baxlaw@gmail.com>

C/A No.: 9:19-cv-2163-RMG-MGB

3 messages

AN Bax <office.baxlaw@gmail.com>
To: cscott@lawofficeofchristyscott.com

Wed, Apr 8, 2020 at 4:08 PM

Good afternoon,





Please find the attached Request for Production and Interrogatories to the Defendant. Hard copies will follow. Please do not hesitate to contact me if you have any questions or concerns. Thank you.

Respectfully,

Elizabeth Bufkin
Paralegal
The Bax Law Firm PA
2 Merchants Lane Suite 210
Beaufort, SC 29907
O: (843) 522-0980
F: (843) 379-3115
E: office.baxlaw@gmail.com
Website: www.baxlawfirm.com
Facebook: www.facebook.com/BaxLawFirm/

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4 attachments

-  RFP Bluf PD- .docx
21K
-  P Interrogs to D Gibson.docx
27K
-  P Interrogs to D Swinehammer.docx
27K
-  P Interrogs to D Kirkman.docx
27K

AN Bax <office.baxlaw@gmail.com>
To: cscott@lawofficeofchristyscott.com, paaraleggal3@lawofficeofchristyscott.com

Fri, Aug 21, 2020 at 12:08 PM

Request for Production and Interrogatories to the Defendant sent April 8,2020

Sincerely,

Elizabeth Bufkin
Paralegal
The Bax Law Firm PA
10 Sams Point Way Ste B-1 PMB 138
Beaufort, SC 29907
O: (843) 522-0980
F: (843) 379-3115
E: office.baxlaw@gmail.com



AN Bax <office.baxlaw@gmail.com>

C/A No.: 9:19-cv-2163-RMG-MGB

2 messages

AN Bax <office.baxlaw@gmail.com>

Fri, Aug 21, 2020 at 1:24 PM

To: Destiny Rose <paralegal3@lawofficeofchristyscott.com>, cscott@lawofficeofchristyscott.com, "leadparalegal lawofficeofchristyscott.com" <leadparalegal@lawofficeofchristyscott.com>

Cc: Bax Law Firm <arie.baxlaw@gmail.com>, Naki Richardson-Bax <naki.baxlaw@gmail.com>

Destiny,

I just wanted to follow up from our earlier conversation and resend you what I mailed and emailed on April 8th.

I attached the pdf versions of the Interrogatories and Request for Production and cover letter with a scanned copy of the envelope that was mailed to your office on April 8, 2020. Also attached in pdf version is the email that was sent to Ms. Scott email, as that was the only email address I had at the time, with the Word versions of the same. (which was forwarded to you today Aug 21, 2020)

If you require any further information please let me know.

Sincerely,

Elizabeth Bufkin

Paralegal

The Bax Law Firm PA

10 Sams Point Way Ste B-1 PMB 138

Beaufort, SC 29907

O: (843) 522-0980

F: (843) 379-3115

E: office.baxlaw@gmail.com

Website: www.baxlawfirm.com

Facebook: www.facebook.com/BaxLawFirm/





*****Due to the current state of emergency, Bax Law Firm is operating remotely only. We are still available via telephone (843) 522-0980 and email. We are scheduling meetings via Telephone and Zoom or Facetime video conference. Although we are receiving mail, kindly email any documents requiring an immediate or timely response.*** Our physical location will be closed until further notice.**

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6 attachments**Ellis 4.8.20 Letter to OC.pdf**

1178K

Email to OC Ellis 4.8.20.pdf

 469K Interrogs to Gibson.pdf
826K Interrogs to Kirkman.pdf
828K Interrogs to Swinehammer.pdf
833K Plaintiff RFP to Defendant.pdf
996K**AN Bax** <office.baxlaw@gmail.com>

Tue, Sep 8, 2020 at 12:44 PM

To: cscott@lawofficeofchristyscott.com, "leadparalegal lawofficeofchristyscott.com"

<leadparalegal@lawofficeofchristyscott.com>, tstephens@lawofficeofchristyscott.com, Destiny Rose

<paralegal3@lawofficeofchristyscott.com>

Cc: Bax Law Firm <arie.baxlaw@gmail.com>, Naki Richardson-Bax <naki.baxlaw@gmail.com>

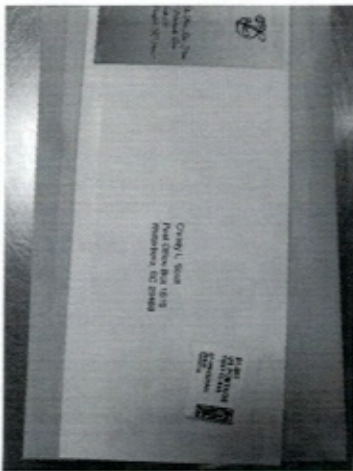
 Preliminary Expert Report, 4-1-2020.pdf

Good afternoon,

Attached is the Preliminary Report that was sent to you on April 27th via email and hard copies were sent via USmail to Christy Scott's Office PO Box on April 28, 2020. Also attached is the pdf version of the cover letters and the copy of the envelope with date written upon it and the picture of the envelope that was taken at the time it was put in the mail.

This is the second time your office has 'lost' discovery and quite frankly it is really frustrating that I have to stop what I am currently working on to locate the proof of where I sent the discovery to you and resend it. If you were expecting a certain type of discovery and for some reason you weren't able to open it or have access to it, why wouldn't anyone in your office say anything about it then? Not to mention, when I spoke to Destiny on August 21st, she said one of your new paralegals lost our discovery request that was sent to you on April 8th.

I get it, things happen, but four months have gone by since it was sent to you and not a word of anything missing. It's ridiculous that this much time has passed, our attorneys have spoken to each other, and none of this was mentioned until now.




Sincerely,

Elizabeth Bufkin
Paralegal
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Beaufort, SC 29907
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F: (843) 379-3115
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